

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
 v.)
)
DZHOKHAR TSARNAEV)

Crim. No. 13-10200-GAO

**ASSENTED-TO MOTION TO ENLARGE TIME FOR FILING MOTION TO
SUPPRESS DIGITAL EVIDENCE BY THREE BUSINESS DAYS**

Defendant, Dzhokhar Tsarnaev, by and through counsel, with the assent of the government, hereby moves this Court to enlarge the time for filing motions to suppress digital items of evidence by three business days, to May 12, 2014.

The defense has drafted and is preparing to file multiple motions this day, including motions to suppress various items of evidence and a motion to suppress defendant's statements. All of the motions to suppress evidence, which arise from the execution of at least 35 searches, raise complex issues. In regard to the motion to suppress various items of digital evidence, the government this past Friday disclosed additional discovery provided by Google. The defense requires a short period of time to determine whether the additional items can or should be addressed in the motion to suppress digital evidence.

For this reason, defendant requests the Court to allow an enlargement of time of three business days, until May 12, 2014, to file motions to suppress digital evidence.

Dated: May 7, 2014

Respectfully Submitted,
DZHOKHAR TSARNAEV
By his attorneys

/s/ Timothy Watkins

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 7, 2014.

/s/ Timothy Watkins